

REMARKS

This response is to the Office Letter mailed in the above-referenced case on February 18, 2005. Claims 1, 2, 4-7, 9-11 and 13-20 are presented for examination. Claims 1, 2, 4-7 and 9 are rejected under 35 U.S.C. 112, first paragraph. Claims 1, 2, 4-7 and 9 are rejected under 35 U.S.C. 101. Claims 1-2, 4-7, 9-11 and 13-19 remains rejected under 35 U.S.C. 103(a) as being unpatentable over Burson et al. (US 6,4058,245) hereinafter Burson. Claim 20 remains rejected under 35 U.S.C. 103(a) as being unpatentable over Burson in view of Thompson et al. (US 6,571,253) hereinafter Thompson.

The applicant has carefully noted and reviewed the Examiner's rejection, reference and comments. Applicant herein provides detailed arguments to more particularly point out the subject matter regarded as patentable by applicant over the prior art provided by the Examiner, as the reference clearly fails to support the 103(a) rejection presented by the Examiner. Claims 1 and 10 are herein amended to overcome the 101 rejection.

Regarding the 112 rejection, the Examiner states that claims 1, 2, 4-7 and 9 fail to comply with the enablement requirement. The Examiner objects to the claim language, *"... wherein the software bundle functions as a fully automated navigation system capable of performing all of the functions of a manual navigation system controlled by a user having a data-input system for controlling the navigation system and the set of machine-readable instructions provided from an external source other than the control application,"* the Examiner states that the invention must be capable of performing "all" of the functions of a manual navigation system. However, the Examiner continues, the specification does not clearly state what all of the functions of a manual navigation system are, nor does it state how the invention supports each and every function of a manual navigation system, thus, rendering the claim indefinite due to the lack of

enablement.

Applicant respectfully traverses the Examiner's understanding of applicant's claim language, and the reasoning provided Re; enablement. Enablement is not a characteristic of a claim, but of the teaching of the specification, which is the applicant's donation to the public in return for a patent on that which is new and not obvious under the law. The enabling inventive idea recited in claim 1 is the capability of the system to perform any or all of the manual navigation functions a user could perform, by initiating the functional programs through a browser platform as integrated by the APIs and as instructed by the machine-readable set of instructions. The variety of different functions the user could manually perform are not limiting to the invention as long as the user manually navigates with the data-input system. The idea here is that there are no functions that a user manually performs, that the software-bundle could not also perform on the user's behalf utilizing the APIs and machine-readable instructions. It is not realistic in this context that the applicant list every function possible in a manual navigation sequence, as it is an unnecessarily laborious task. It is not the different functions that the applicant is inventing or claiming, but the ability to perform any function a user would manually perform. It is also not required of any applicant that he or she be held to a standard that requires teaching that which is already well-known in the art. Applicant believes that the 112 rejection is therefore unwarranted, and must be withdrawn

Regarding the 103 rejection for claims 1-2, 4-7, 9-11 and 13-19, applicant's claim 1 specifically recites: "wherein the software-bundle functions as a fully automated navigation system capable of performing all of the functions of a manual navigation system controlled by a user having a data-input system for controlling the navigation system and the set of machine-readable instructions is provided from an external source other than the control application." Applicant argues that Burson fails to teach or suggest such a functionality as claimed.

Column 8, line 46 to column 9 line 6 of Burson specifically highlights the shortcomings of Burson's system in relation to applicant's invention as claimed. Burson teaches that a failed registration could result from several situations.

First, the end user attempting to register with the PT provider does not qualify for registration; for example, an end user attempting to register with a bank with whom the end user 50 does not maintain an account and where the bank only allows access to account holders. Next, the end user may have supplied improper or incorrect information. For example, a bank registration process might require a social security number, a password, a bank account number and the maiden name of the end user's mother; if the user entered an incorrect social security number, the registration process would fail. Finally, the PT provider may have altered the registration procedure for its Web site. In this situation, following the process supplied from the Provider store 320 would yield a failed registration. In the instance of any registration failure, the end user could be presented with the data initially supplied to the system for registration. The system could then ask the end user to double check the correctness of the information provided and to correct and resubmit the data if an error is found. A second failure resulting from the submission of identical requisite data might generate an error message presented to the end user.

Applicant teaches that user-names, log-in codes, passwords, and the like are generated and submitted by the auto-registration process. This can be accomplished under partial user direction, or it can be accomplished completely without user involvement. In the first case, user 203 may have a list of unused passwords, user-names, and/or log-in codes that were pre-chosen and stored along with profile information. In the second case, such submissions may be automatically generated and submitted according to form requirements and site rules wherein the user has no knowledge of the data even after successful registration. The second embodiment follows a scenario wherein passwords and the like are optionally managed by the password-all portal service of application S/N 09/208,740.

Referring again to Fig. 10 of applicant's invention, IS 221 is responsible for request generation (RG). Applying all of the required site data, navigational data, and profile data, IS 221 creates a job-order containing complete instruction for navigation, form filling, and data return. Applicable user data is encrypted when transferred over

secure socket links (SSL) as is known in the art.

Applicant argues that when a problem arises in applicant's system such as the one described above in Burson, applicant's system is capable of substituting other information on file *or generating new information to be submitted* so the navigation and data gathering can be accomplished, fully automated and unknown to the user. Applicant argues that only with the capabilities claimed and taught in applicant's specification can a system perform all of the functions of a manual navigation system controlled by a user, as claimed (P.58).

Applicant argues that the PI provider Web sites, as disclosed in Burson , are manually configured wherein templates and PIC files are stored for each provider. Applicant argues that Burson teaches away from the API's as disclosed and claimed in applicant's invention because the functions of applicant's API's are not needed in Burson as Burson does not need to integrate with external sources as claimed in applicant's invention. The Examiner states that Burson teaches that the set of machine readable instructions is provided from an external source, other than the control application relying on Burson's teachings in col. 4 line 66 to col. 5, line 21, reciting that additional procedures necessary to complete a transaction may be stored within the PI store. Applicant argues that the PI store of Burson is within the control application and *not* external to the control application as claimed.


Applicant argues the main goal of the present invention is to provide a fully functional and truly automated navigation system that may be spawned and executed to completion based on machine-readable instruction. Burson fails to teach or suggest the advanced automated browsing and data collection process of applicant's invention.

In view of the above amendments, arguments, and remarks it is clear that the reference of Burson fails to suggest the limitations of applicant's claims. It is therefore respectfully requested that this application be reconsidered, the claims be allowed, and that this case be passed quickly to issue.

If there are any time extensions needed beyond any extension specifically requested with this amendment, such extension of time is hereby requested. If there are any fees due

beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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